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January 13, 2022

VIA ECF

Hon. Paul G. Gardephe
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2204
New York, NY 10007

Re: Request to Extend Briefing Schedule
Watkins v. Anthony T. Rinaldi, LLC et al.
1:19-cv-08457-PGG-JLC

Dear Judge Gardephe:

This firm represents the Defendants in the above-referenced action. Pursuant to Paragraph I(D) of Your Honor's Individual Rules of Practice, the Defendants write with Plaintiff's consent to respectfully request an extension of the briefing schedule regarding summary judgment. *See* ECF Doc. 62, 64 & 65. By letter dated December 17, the undersigned requested an extension of time because two of the undersigned's family friends passed away. The same day that this letter was filed, a member of the undersigned's family passed away. A short time thereafter, at the end of December, the undersigned had a medical concern that required prompt attention. For these reasons, the undersigned requires a two-week extension to complete the Defendants' summary judgment motion.

Based on the number of witnesses in this case and the amount of record evidence, this extension has become necessary. I do not take extension requests lightly, and if additional information is required, I would strongly prefer to provide it off-record, during a conference away from the public docket.

The current schedule is as follows: (1) January 20, 2022 (Defendants' moving papers); (2) February 21, 2022 (Plaintiff's opposition); and (3) March 10, 2022 (Defendants' reply). *See* ECF Doc. 65.

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The proposed briefing schedule is as follows:

- Defendants' motion is due on February 3, 2022;
- Plaintiff's opposition is due on March 7, 2022;
- Defendants' reply, if any, is due on March 24, 2022.

This is the third request to extend Your Honor's briefing schedule. The Defendants will not request any additional extension of this summary judgment deadline. Granting this request will not affect scheduled dates other than those indicated above.

Thank you for Your Honor's consideration.

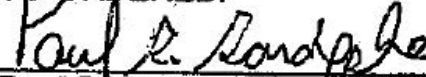
Respectfully submitted,
CLIFTON BUDD & DeMARIA, LLP
Attorneys for the Defendants

By: 
Ian-Paul A. Poulos

MEMO ENDORSED

The Application is granted.

SO ORDERED:


Paul G. Gardephe, U.S.D.J.

Dated: January 14, 2022

CC: Counsel of Record (via ECF)